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KEY INSURANCE GROUP

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CARSTEN LEE, an Individual;
Plaintiff,

vs.

KEY INSURANCE COMPANY, a Foreign
Corporation; d/b/a STORM LEGAL GROUP and
d/b/a DESERT RIDGE LEGAL GROUP; DOES
1-25, inclusive; and ROE CORPORATIONS 1-25,
inclusive,
Defendants

CASE NO.: 2:24-cv-01747-JAD-EJY

STIPULATION AND ORDER TO EXTEND DISCOVERY

COME NOW, Defendant KEY INSURANCE COMPANY (erroneously named as “KEY INSURANCE COMPANY d/b/a STORM LEGAL GROUP and d/b/a DESERT RIDGE LEGAL GROUP”), by and through its attorneys of record, JAMES P. C. SILVESTRI, ESQ., JOSE E. CARMONA, ESQ., and GAVIN W. DEAN, ESQ., of the law firm PYATT SILVESTRI, and Plaintiff CARSTEN LEE, by and through his attorneys BRICE J. CRAFTON, ESQ. and COLTON JAMES WILSTEAD, ESQ. of the law firm of DEEVER | CRAFTON, and PATRICK W. KANG,

ESQ. KYLE R. TATUM, ESQ. and ADAM L. GILL, ESQ. of the law firm of KANG & ASSOCIATES, PLLC, and hereby STIPUALTES and AGREE as follows:

WHEREAS, on February 12, 2025, the Parties Stipulated and Agreed to extend the deadlines set forth in the discovery plan.

WHEREAS, on February 12, 2025, there remained more than 21 days before the expiration of all but two deadlines—the deadline to amend the pleadings or add parties and the deadline for initial expert disclosures.

WHEREAS, the Parties agree that they **are not** seeking to extend the deadline to amend the pleadings or add parties.

WHEREAS, the Parties agree that they **are not** seeking to extend the deadline to provide initial expert disclosures.

WHEREAS, the Parties agree that all deadlines that fall on a Saturday, Sunday, or legal holiday have been scheduled for the next judicial day.

1. Good Cause for the Requested Extension

The Parties agree that additional time for discovery is required in light of the Parties trial calendars. Counsel for Defendant was in trial in January. Counsel for Plaintiff will be in trial in mid to late March. Further, Defendant's Rule 30(b)(6) witness is not available in February for a deposition. Lastly, Plaintiff's counsel has a medical procedure that makes the deposition difficult to set in early March.

2. Discovery Completed

The Parties have already exchanged Rule 26 disclosures. Defendant has supplemented its disclosures. The Parties already disclosed their initial experts. The Parties are diligently working on setting depositions around their firm trial schedules.

3. Specific Description of Discovery Remaining to be Completed

The Parties agree that they must take Defendant's 30(b)(6) deposition, subject to a deposition notice and topics, two expert depositions, and potential percipient witness depositions. Further, the Parties may need to retain rebuttal expert(s). Lastly, written discovery may be completed, as needed by the Parties.

1 **4. Reasons Discovery was not Completed**

2 The Parties required additional time for discovery is required in light of the scheduling
3 conflicts identified in Subsection 1.

4 **5. Proposed Schedule**

5 For the foregoing reasons, the Parties STIPULATE AND AGREE that all previously agreed
6 to discovery deadlines should be extended by **60 days** as follows:

7 a. **Areas of Discovery:** The Parties AGREE that the areas of discovery should include,
8 but not be limited to, all claims and defenses allowed pursuant to the Federal Rules of Civil
9 Procedures.

10 b. **Discovery Cut-Off Date [LR 26-1(b)(1)]:** Pursuant to the initial Stipulated
11 Discovery Plan and Scheduling Order, the last day of discovery was **April 9, 2025**. The Parties
12 STIPULATE AND AGREE that the last day of discovery shall now be **June 9, 2025**.

13 c. **Amendment of Pleadings and Adding of Parties [LR 26-1(b)(2)]:**
14 **UNCHANGED.**

15 d. **F.R.C.P. 26(a)(2) Disclosures (Experts) [LR 26-1(b)(3)]:** Pursuant to the initial
16 Stipulated Discovery Plan and Scheduling Order, the last day to disclose rebuttal experts and their
17 expert reports was on **March 10, 2025**. The Parties STIPULATE AND AGREE that the last day to
18 disclose rebuttal experts and their expert reports shall now be **May 9, 2025**, which is at least 30 days
19 after the initial disclosure of experts.

20 e. **Dispositive Motions [LR 26-1(b)(4)]:** Pursuant to the initial Stipulated Discovery
21 Plan and Scheduling Order, the last day to file dispositive motions was **May 9, 2025**. The Parties
22 STIPULATE AND AGREE that the last day to file dispositive motions shall now be **July 9, 2025**,
23 which is 30 days after the proposed discovery cutoff date.

24 f. **Pre-Trial Order [LR 26-1(b)(5)]:** Pursuant to the initial Stipulated Discovery Plan
25 and Scheduling Order, the joint pre-trial order was to be filed by **June 9, 2025**. The Parties
26 STIPULATE AND AGREE that the joint pre-trial order shall now be filed by **August 8, 2025**, which
27 is at least 30 days after the date set for filing dispositive motions. If a dispositive motion is timely
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1 filed, this deadline is suspended until 30 days after decision of the dispositive motion or further order
2 of the Court.

3 g. **Trial Readiness:** The case should be ready for trial by **October or November of**
4 **2025** and is expected to take approximately **3-5 full days**. The parties shall make the pretrial
5 disclosures required by FRCP 26(a)(3) at least 30 days before trial. Objections to pretrial disclosures
6 must be made no later than 14 days thereafter.

7 DATED this 12th day of February, 2025.

DATED this 12th day of February, 2025.

8 **PYATT SILVESTRI**

KANG & ASSOCIATES, PLLC

9 /s/ Jose E. Carmona

/s/ Patrick Kang

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Attorneys for Defendant

Attorneys for Plaintiff

13 **ORDER**

14 **IT IS SO ORDERED.**

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17 UNITED STATES MAGISTRATE JUDGE
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19 DATED: February 14, 2025
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